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CLERK, U.S. DISTRICT COURT
NORTH DISTRICT OF CALIFORNIA

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9 IN THE UNITED STATES District Court
10 FOR THE Northern District of California

11 Taiming Zhang) Case No. 4:23-cv-05448

12) 4:23-cv-05885

13 Movant)

14) motion to intervene;

15) ex parte motion for service by

16) US Marshals and to proceed IFP;

17) all motions WITHOUT HEARING

18 1. I move to intervene per FRCP 24 (b) (1) (B). I have "a claim or defense that
19 shares with the main action a common question of law or fact". Specifically,
20 I have a claim that shares with the main action a common question of law.
21 This is an application for Permissive Intervention and is at the discretion
22 of the Court. *As well*, disposing of the action may as a practical matter
23 impair or impede the movant's ability to protect its interest, so I also move
24 to intervene as a matter of right per FRCP 24 (a) (2).

25 The claim is 3:23-cv-00980 in this court (CAND). It is on appeal at the ninth
26 circuit under 23-16125 (pending), and 23-15740 (closed). It was dismissed
27 entirely by the judge JSC, who lied ruthlessly on even what the contract
28 said, deleting contract terms to achieve the false dismissal. I will come back
29 to the conduct of JSC, and trust me it is relevant.

30 2. I have been granted IFP status in that other case. I should be granted the
31 same. I still, because of serious emotional distress caused by murderer
32 Andrew Joseph Bonomolo {who also has committed so many crimes other

Motion to intervene



1 than murder and fraud including countless occasions of public sex (indecent
 2 exposure NC crime), in fact public sex is currently his only source of income,
 3 hundreds of 18 USC 2257 violations, driving without a license, owning and
 4 driving a vehicle with expired registration, prostitution, solicitation (online
 5 advertisement) to prostitution, reckless endangerment and intentional HIV
 6 spread, lying or misleading police and submitting a false report (NCGS 14-
 7 225 False incl. misleading reports to law enforcement agencies or officers),
 8 but the Pittsboro PD of NC AS WELL AS the DOJ and FBI for no proper
 9 reason just won't do anything to him; the PD has let him drive without a
 10 license for over TWO YEARS now}, and Twitter, and others but mostly
 11 them, am suffering from MDD and GAD (medical depression and anxiety)
 12 and thus **cannot work or study.** I have no savings and own no property,
 13 and have no income. My financial situation has not changed, and I still
 14 am in serious emotional distress. FURTHER, there is VERY real and
 15 EXTREME difficulties of serving the MULTIPLE (over 40) other parties as
 16 I am situated in China; usually when a party is granted IFP status, it is
 17 ordered the US Marshals serves the documents. For these reasons, it is
 18 asked I am allowed to proceed IFP and the Marshals serve the documents.

19 IN THE MEANWHILE, I really hope the state AGs especially NC AG and NY
 20 AG will do something about murderer Andrew Joseph Bonomolo's countless
 21 crimes and will act to stop his endless path and wander of criminality.

22 In fact his whole family are criminals. For context, he obtains his only source
 23 of income with his Toyota car parked at 342 Chatham Forest Drive, Pittsboro,
 24 NC, 27312, and he has to physically be there to use the car for criminal public
 25 sex (indecent exposure), and whenever he's in NC, he does live there. His
 26 mother, Karen Marie White Bonomolo, no longer has legal entitlement to the
 27 property that is 342 Chatham Forest Drive, Pittsboro, NC, 27312. This is the
 28 result of a Chapter 7 bankruptcy. The loan was discharged. With the loan



1 discharged, cancelled that is, she doesn't own any legal right to abode at that
 2 house anymore. HOWEVER, she continues to live there with Giana Nicole
 3 Bonomolo (**second degree burglary NC crime**), and even filed and paid false
 4 estate taxes without revealing that she no longer has a loan or any right to
 5 that property at all. False taxes and false payment of course are crimes too.
 6 For some weird reason, WSFS bank won't do foreclosure, and they have no
 7 reason not to act, which is fraud against stockholders and they need to be
 8 charged for that fraud.

9 Really, NC is entirely lawless with the tiny little gang like group that is the
 10 Pittsboro Police Department in Chatham County. **I really hope y'all can**
 11 **step in and charge Giana, Karen, and as well Andrew Joseph**
 12 **Bonomolo for the countless crimes they've committed.**

13 If he continues on wandering this path of criminality, more people will fall
 14 victim. There really will be a day when it is all too late to stop him. He is two
 15 steps away from owning a gun and he is incredibly dangerous, especially
 16 dangerous with his as yet neotenous face. He shouldn't pass any background
 17 checks but without a criminal record, he will easily pass any. He intentionally
 18 pursues the death of innocent man and is utterly indifferent to others' basic
 19 rights. I am extremely serious when I say you can't even find a Disney villain
 20 like this. **He really is just a heinous criminal and will not stop**
 21 **committing crimes.**

22 Please. States of NY and especially NC need to intervene and make sure justice
 23 is served. Somebody get the FBI to charge him for the countless crimes
 24 including hundreds of 2257 violations too. Please. His crimes need to stop.

25 You guys should also write to Twitter and OnlyFans to shut him down. Their
 26 contracts and the law oblige them to shut him down.

27 You can find evidence of his countless public sex and how it is his only source
 28 of income at <https://x.com/troyejacobs/>



3. There however are extremely compelling reason for the Court to allow intervention. Specifically, the first reason to intervene is as follows:

The motion to dismiss in the case relies largely on CDA 230 subsection c1. Adverse rulings purportedly “relying” upon the same were made in 4:22-MD-3047-YGR, greenlighting certain violations of law. **As held in that case, “Plaintiffs’ framing does not change the analysis. Nothing in Section 230 or existing case law indicates that Section 230 only applies to publishing where a defendants’ only intent is to convey or curate information.”**

The current “interpretation” of 230 by the ninth circuit is unconstitutional in an extremely contemptuously straightforward way (literally the sheer opposite of what the Constitution ordains), subverts the TEXT of that very law by ignoring the grammatical meaning of a certain word in that very clause, and is undoubtedly against the legislator’s intent.

In short, the first reason to intervene is that unfortunately, **the 42 states’ AGs’ case given 4:22-MD-3047-YGR is destined to fail without my intervention** which looks at the constitutionality of such “interpretation” that is not only unconstitutional but against the TEXT of that very clause by ignoring the grammatical meaning of a certain word. If the court does not look at my arguments, their case is destined to fail. AND, further, because my argument roots in the Constitution, it’d be a failure of the Constitution. I will go into details later on my arguments.

As well, my first amendment argument should also be considered. **The earlier ruling 22-MD-3047-YGR subverted other clauses of the Constitution, and that earlier ruling had not been tackled by the 42 state AGs.** Without my intervention, the same judge will probably rule similarly.

4. In the response to motion to dismiss, the State AGs wrote “Because the States seek to hold Meta liable for its role as the product designer and promoter of its Platforms, rather than as the publisher of third-party



1 content shown on those Platforms, Meta cannot avail itself of this
2 provision.”...“A claim does not treat a defendant as a publisher under the
3 second prong of the Barnes test merely because publication is relevant to
4 the claim. Instead, to fall within Section 230, the claim must impose on the
5 defendant a duty to make “changes to the content posted by the website’s
6 users.” Order Denying in Part and Granting in Part Defendants’ Motion to
7 Dismiss, ECF 430 (“MTD Order”) at 11 (quoting Doe v. Internet Brands,
8 Inc., 824 F.3d 846, 851 (9th Cir. 2016))”—Page 15, doc 95 of docket.

9 “Publication” is a strictly defined concept involving “reviewing, editing, and
10 deciding whether to publish or to withdraw from publication third-party
11 content,” including reproducing material for publication and editing for
12 style and technical fluency, altering content, and postponing content.

13 Barnes, 570 F.3d at 1102; see also Lemmon, 995 F.3d at 1091; Fair Hous.
14 Council v. Roommates.com, 521 F.3d 1157, 1170–71 (9th Cir. 2008); Zeran
15 v. Am. Online, Inc., 129 F.3d 327, 332 (4th Cir. 1997). (Page 19, doc 95 dkt)

16 HOWEVER, it is so clear that much of the complaint attacks the algorithm
17 and feed and push notification features of Instagram, which is republishing,
18 which is “changes to the content posted by the website’s users”, which is

19 “reproducing material for publication and editing for style and technical
20 fluency, altering content, and postponing content”. Rearranging or
21 replacing is changing. As long as it is republishing, it falls within the 9th
22 circuit current subversive interpretation of 230 c1. “Features designed to

23 lure users back onto its Platforms” is the same: it also is about republishing.

24 **As I stated**, as held in the earlier case against tiktok and others by YGR
25 (same judge presiding in this case), **“Plaintiffs’ framing does not change**
26 **the analysis. Nothing in Section 230 or existing case law indicates**
27 **that Section 230 only applies to publishing where a defendants’**
28 **only intent is to convey or curate information.”**



Holding them as the product designer does not change anything as the design is about publishing and republishing so I hardly see any difference. The rest of the "STATES' OPPOSITION TO META'S MOTION TO DISMISS" repeats how serious the violations of countless laws by meta are, how evident their claim is, but they have not adequately tackled the assertion by Meta's lying lawyers on what CDA 230 says, BUT INSTEAD, the States' AGs CONCUR with the 9th circuit's subversive falsities on what CDA 230 says.

5. The failure would be a total one here. The allegations are different in this case. If the falsity on what that law says stands, this entire case would fail.
6. The second reason to intervene is the extreme public interest in this case. This obviously is a case that concerns what near all of the general public will experience. For that reason, the Court should carefully consider all pertinent arguments.
7. The third reason to intervene is that disposing of the action may as a practical matter impair or impede the movant's ability to protect its interest. I was born in October 1998, and much of the conduct alleged did impact me as a child. I was a youth Facebook and Instagram user. The complaint by the AGs includes claims for damages on behalf of victims; it follows that if I do not intervene, I cannot claim for those damages separately due to claim preclusion (res adjudicata). Payne v. Nat'l Collection Sys., Inc., 91 Cal.App.4th 1037, 1047 (2001) does NOT say I can litigate on the same merits: this case already claims those damages on behalf of victims. The first reason to intervene stated in this document already proves that the existing parties may not adequately meet the applicant's (my) interest, as they haven't come up with an argument to win against the purported CDA 230 c1 argument and 1st amendment argument by Meta. Statute of limitation is not an issue for reasonable discovery. Before this



lawsuit filed by the state AGs, I, although victim to the conduct, as a person under 18, did not recognize what they were doing and their pattern of behaviors. I only discovered how they harmed me NOW, and not earlier. I do suffer from phone and computer addiction and addiction to endless feed.

8. Back to the first reason, my arguments are reasonably arguable, and they must be considered. I shall discuss 230 c1 first. I'll come back to the first amendment after discussing 230 c1.

Very weirdly, for decades, no one has reviewed the Constitutionality of 47 U.S. Code § 230, or at least the ninth circuit's construal of it. This is quite unique. Normally, laws related to speech have constitutional reviews filed on all the time. But this one became a one-off.

THEN, social media companies have changed nature and gone cray cray over the past few years. When the law was written, smartphones did not exist, and targeting youth and children and children pornography were not issues prevalent. In recent years, however, not only is targeting teens for profit a real thing, in 21-cv-00485-JCS, court found the fact that twitter received confirming evidence—children's IDs and knew child porn on its platform, and decided to KEEP the child pornography on its platform, against their contract saying they have zero tolerance for child pornography. Political messages are also targeted. Harvard-graduated doctors' speech and suggestion on COVID or SARS Junior policies were deleted as "misinformation" by twitter. Multiple Congressmen wrote to social media companies, on a) charges of practical treason and/or contempt of the US, as their disrespect for the first amendment is disgusting and unacceptable as a public actor, b) deleting content not in violation of anything, editing and reforming information to manipulate public perception and to change meaning and defame, c) not deleting content clearly banned by its contract and causing serious harm by not deleting, namely twitter keeping Taliban's



1 accounts full of lies during and after the disastrous withdrawal from
 2 Afghanistan. Compared with twitter, the conduct of Meta is MUCH more
 3 restrained, but they still have committed serious crimes with what they do.
 4 As Mr. Yan wrote, he was pushed obscene material by push notifications by
 5 Facebook. This contemporary context adds urgency to properly construing
 6 CDA 230 c1. Other than the above problems, social media companies are
 7 criminal syndicates that have committed countless crimes relating to illegal
 8 manipulation and fraud (breach of contract). Namely, near all social media
 9 companies in fact promises content deletion or moderation in their
 10 contracts, and such freedom of molestation clauses are the main theme of
 11 most social media companies' contract, and is a major purpose of contract.
 12 *I should specially mention here:* consumers are the intended beneficiaries
 13 third parties to the contracts they have with advertisers. So a breach is a
 14 violation of the right to property. Further, those companies chose those
 15 companies to advertise, but not other companies, largely because they offer
 16 freedom of molestation, as they want to be seen as ethical by the public. If
 17 those advertisers were directly aware of Twitter's involvement of child porn,
 18 they would have dropped a long time ago. Repeated breaches is therefore a
 19 MATERIAL BREACH of those ad contracts.

20 For decades, there has been a special privileged class in America, simply
 21 because they are internet content providers (ICP), but have some functions
 22 as ICSs where part of their service provides mere access, they have been
 23 ABOVE THE LAW. They get away with harassment, fraud, defamation,
 24 etc.. This subverts the Constitution to the point of no return.

- 25 9. I should discuss the nature of "changes to the content posted by the
 26 website's users" or "reviewing, editing, and deciding whether to publish or
 27 to withdraw from publication third-party content," including "reproducing
 28 material for publication and editing for style and technical fluency, altering



1 content, and postponing content”.

2 By nature, altering someone else's messages changes its meaning. The
3 modification process is not shown, and there's no otherwise trace of such
4 manipulation, so others sees it as if it were from the original messenger.
5 THAT IS CLASSIC defamation of character.

6 Equally, if a strain of messages is redacted or abridged, say 3 out of five is
7 deleted, and the others are untouched, the meaning also changes, and that
8 also is defamation of character. AS WELL, it manipulates public perception.
9 Then, the immunity with any republishing practically means they are
10 allowed to harass anyone they want, as long as their harassment is with
11 someone else's (their version of “another ICP”) speech. Court is reminded
12 that c1 says “provider or user”. So even if a user continuously harasses
13 people, it is not an issue under the ninth circuit's interpretation as long as
14 they are copying and pasting someone else's speech from the platforms.

15 The conduct of choosing what is on the site's home page is also an editorial
16 choice, and is not providing mere access (definition of ICS). Even per the
17 grammatical meaning without evaluating anything else, such is
18 development of information in part. Creation or development of information
19 in whole or in part is definition of ICP. Naturally, the definition of
20 development of information is that it must not be creation of information in
21 part, or else WHY would congress say “Creation or development of
22 information in whole or in part”. It is for this reason, the act of rearranging
23 is naturally development of information in part. Twitter and Facebook's
24 home pages are handpicked, and that is development of information (its
25 home page) in whole in my opinion. Creation is a fairly distinct word from
26 development. Details later on the two words in the summary at ¶f.

27 *I put forth my opinion that lying lawyers who indeed ARE criminals are a*
28 *terrorist group preying on everything the Constitution guarantees.*



1 The fifth amendment to the US Constitution says (things not relevant to
2 this suit redacted): No person shall be, ..., nor be deprived of life, liberty, or
3 property, without due process of law,

4 Section 1 of the fourteenth amendment to the US Constitution says (things
5 not relevant to this suit redacted): No State shall make or enforce any law
6 which shall abridge the privileges or immunities of citizens of the United
7 States; nor shall any State deprive any person of life, liberty, or property,
8 without due process of law; nor deny to any person within its jurisdiction
9 the equal protection of the laws.

10 **OF COURSE, allowing a certain privileged group to get away with**
11 **breach contract and do other harms including tort intentional and**
12 **negligent and defamation denies to people “within its jurisdiction**
13 **the equal protection of the laws”**. As well, allowing them to break
14 the law without civil consequences abridges the privileges of all
15 Americans other than the privileged group.

16 **THEN, the fifth protects right to property**. So there is no allowing
17 breach of contract per the Constitution.

18 **10. In summary, what I stated in 3:23-cv-00980 and 23-16125 on CDA 230**
19 **c1 is as follows:**

20 a) The conduct of allowing a certain group of people (social media
21 companies and search engines and streaming) breach of contract, fraud,
22 IIED, defamation (again, manipulating others' speech, namely deleting
23 certain words from a chain of expressions, is defamation as it changes
24 the meanings), failure of duty of care, intrusion of privacy, harassment,
25 UCL violations, and even intentional possession of child pornography,
26 could not possibly fit the 14th amendment incl. equal protection clause.
27 Such selective allowing of violation of rights denies to people “within
28 its jurisdiction the equal protection of the laws”. Breach of
29 contract is even specifically banned by the 5th, as it relates to violation
30 of the right to property. **The same duties of others can't just be**



1 exempt for a group, as that is abridgement of rights and
 2 privileges of Americans (Americans who are not social media
 3 companies) which violates the fourteenth amendment. Such
 4 exemption or differential treatment or special privileges to one section
 5 is strictly unconstitutional. See specifically Brown v Board of
 6 Education. For the purpose of compliance with the fourteenth
 7 amendment, where equality and lack of "special privilege" are
 8 constitutionally required, it includes also nonfeasance, negligence. If a
 9 doctor or caregiver is held accountable for negligence, social
 10 media must also be held accountable per the Constitution
 11 specifically the EPC.

12 b) I've said stated clearly, editing or altering others' expressions is pure
 13 and simple defamation, and more importantly, such editing is the
 14 natural meaning of development of information.

15 c) **The grammar of the law tells a clear story.** c1 treats "provider or
 16 user of an interactive computer service" as one class. It states that that
 17 one class is "another" (*two separate but of the same kind, see*
 18 *dictionary definition of "another": the dictionary definition is "used to*
 19 *refer to an additional person or thing of the same type as one already*
 20 *mentioned or known about"*) to ICPs, which declares "provider or
 21 user of an interactive computer service" as ICPs. As a reminder, Fair
 22 Housing Council of San Fernando Valley v. Roommates.com, LLC, 521
 23 F.3d 1157 (9th Cir. 2008), heavily quoted by JSC, held that if a company
 24 does ICP conduct itself, that ICP conduct holding them as the ICP rather
 25 than another ICP is not immune by CDA 230 c1. The question is always
 26 whether they're being held as the ICP or another ICP, as held by that
 27 case. As stated, the word another means two separate but of the same
 28 kind, if they had a hand in creation or development of information in



1 whole or in part, they are no longer another ICP as they're not
 2 independent from the information and they become THE ICP.

3 Had Congress said "an other", they would at least have a case. However,
 4 the phrase "an other" means "any other" and is grammatically
 5 completely different from the word "another". The word and the phrase
 6 do NOT have the same meaning.

7 d) Then, the specific examples given by Congress as ICSs are
 8 library search engines and internet service providers (ISPs) like
 9 AT&T (see subsection f 2 of 230). The ONLY conduct of theirs
 10 that could be "creation or development of information in whole
 11 or in part" (definition of ICP, see CDA 230 subsection f 3) is blocking
 12 content for AT&T, and sorting and rearranging in presenting
 13 information for search engines, in other words, search engine
 14 algorithms. Nothing else done by search engines and internet service
 15 providers could fit creation or development of information in whole or in
 16 part. So naturally, it follows that all of twitter's conduct of deleting
 17 editing et cetera fits ICP conduct.

18 e) It also follows that failure to delete is also ICP conduct, as they're held
 19 for deleting or not deleting certain content, which is ICP conduct
 20 treating them as the ICP who needs to edit (delete) or should have edited.

21 f) Creation is a fairly distinct word from development. Development talks
 22 about editing/publishing incl. technical style in whole or in part that's
 23 **NOT** creation of information, really "publisher conduct" per the 9th
 24 circuit's subversive falsity. Their subversive falsity treats them as
 25 ONE word i.e. creation, but they are TWO words. No dictionary
 26 lists creation as a synonym to development even. Development
 27 requires creation first; one can't develop from thin air.
 28 Development develops information created. That's the grammar.



g) Legislator's intent is also clear, subsection c2 and d specifically mention blocking content and even has it as a duty, an obligation for them to provide it as a commercial option. c2 states only deletions in GOOD FAITH are immune. It would be really interesting if Congress meant otherwise wouldn't it? How could they possibly mean that all deletions are immune if they specifically say ONLY those in GOOD FAITH are immune. You're gonna tell me the accusation now is that Congress, after careful deliberation and a lengthy legislative process, deliberately acted redundantly for the sake of fun? These terrorists a.k.a. lying lawyers will do anything. Anything at all. There is no limit. Nothing is impossible for the purpose of terrorism. THEN, how could they possibly mean that all deletions are immune, whilst obliging a commercial option to filter content? IF such is true, wouldn't that be a palpably GINORMOUS violation of the fifth amendment? That they have the right to steal property now? Taking money and not providing the service they took money for, which is a service Congress OBLIGES them to provide? That could fit the fifth? Are you kidding me? Is the accusation that Congress made this law to abet and allow FRAUD, to subvert the fifth amendment? LIKE I SAID, there is no limit for these terrorists. They'll EVEN allow the Taliban to lie on the open net to harm U.S. soldiers. They are violent, and they aid and abet violence, including violence against the military, and all evidence evinces that THEY LOVE IT.

h) *Needless to say, those legislator's intents drawn from speculations or EVEN folktales, when such speculation is AGAINST the very text of the very law (clearly false in other words), is nothing but pure nonsense.*

i) **Provided that the "specific" examples of ICSs are search engines**



1 and AT&T, even the assertion by the terrorists that social media
 2 companies are pure ICSs (without ICP conduct) is absurd. What
 3 kind of pure ICS that merely provides access (see definition of
 4 ICS) profits on your addiction to more content, has a FEED that
 5 gets you to read endlessly, and pushes notifications at you? Do
 6 those even resemble providing mere access? They are certainly
 7 completely unlike search engines and AT&T.

8 In fact, even web drives are ICPs, as they obviously moved information
 9 around (made available to someone else) with a link. I should take this
 10 opportunity to remind all that ICP conduct is not illegal per se and is
 11 not conduct that is likely illegal simply by what it is. In fact, again, c1
 12 doesn't even say liability, but ONLY says *treatment as*.

13 AGAIN, Congress said ALL ICS providers ARE ICPs!!!!!!

- 14 j) Naturally, if google search and AT&T are ICPs, everything social
 15 media companies do, from algorithm, to push notification, to
 16 reblogging or retweeting (as they create their home pages), to
 17 deleting stuff, to the feed where they rearrange things per their
 18 will TO PROFIT FROM YOU READING MORE which is the
 19 algorithm, is ICP conduct. The conduct of bringing things before you
 20 and even push notifications are way outside of providing mere access
 21 and are more ICP than Google search and thus is definitely ICP conduct.
 22 Like I said, even without a) the Constitution, b) natural grammar, they
 23 wouldn't fit the definition of an ICS, or rather providing mere access to
 24 another's page is SUCH a small part of what they do every day, they
 25 spend their energy to do every day: speech policing and trying to FEED
 26 you more with the feed et al., which is loosely tied with who you follow
 27 but not entirely: they RECOMMEND pages and EVEN harass you with
 28 unsolicited notifications. The major part of their doing is ICP conduct. If



1 we were to weigh this on a for the most part scale, for the most part,
 2 they're ICPs. Close to everything they do is ICP conduct. Not much of
 3 their business model relates to providing mere access. Although again,
 4 Congress declared all provider of ICSs as ICPs.

5 k) At a5, 230 states "Increasingly Americans are relying on interactive
 6 media for a variety of political, educational, cultural, and entertainment
 7 services.", so it would be nonsensical to allow defamation and
 8 manipulation (editing and deleting of and manipulating political
 9 messages), and b3 says "to encourage the development of technologies
 10 which maximize user control over what information is received by
 11 individuals, families, and schools who use the Internet and other
 12 interactive computer services". Their assertions are against those.

13 l) In any case, if their argument stands, it's an argument to
 14 retribute the whole business, that their business is a contract
 15 illegal in law. Their contract promises to edit in certain ways, which if
 16 c1 means what they assert, they are an illegal business in law and their
 17 business must be fully restituted per law.

18 m) The subversion started with drawing a binary line between ICS and ICP,
 19 BUT c1 literally refers to users of ICSs, how are they not ICPs? This was
 20 intentional subversion, of course from incitement of lawyers, but such
 21 inciter must have known what they were taking out from the law.
 22 MASTER manipulation. I again emphasize my opinion that lying
 23 lawyers who are criminals are a terrorist group preying on everything
 24 the Constitution guarantees.

25 n) The ninth circuit has said that the purpose of the legislation is to
 26 prevent the public suing websites for defamation for hosting someone
 27 else's content (when that content is defamatory). That is the purpose of
 28 c1 and is the ONLY purpose of c1. The distinction between conduct of



1 the ICP versus another ICP is important. They must have completely
2 not touched the information to be called another ICP. Any touching, incl.
3 algorithm and feeds and recommendations, is ICP conduct, and they are
4 liable for that. The Common law already achieved this before CDA 230.

5 Congress should have either not bothered to codify it, or written it better.

6 11. I should clarify, in the amended complaint of 3:23-cv-00980, I did not talk
7 about ISPs. Instead, I stated if library search engines thereby search engine
8 algorithms which merely rearrange things by an algorithm are ICP conduct,
9 THEN it's a no-brainer that deleting or blocking content MUST BE ICP
10 conduct. I did not think about ISP being ICPs. I just used library search
11 engines to make the argument on what development of information in part
12 is. Here, I've added AT&T to complete it.

13 Other than this, everything said above was stated clearly in the amended
14 complaint of 3:23-cv-00980. The judge, JSC, ignored them completely. **She**
15 **subverted multiple clauses of the Constitution, the text of CDA 230,**
16 **and the legislator's intent, and wrote her total dismissal WP. She**
17 **further lied about twitter's contract terms, concealed many terms**
18 **pointed clearly to her by me, to defeat justice, and ruled on the case**
19 **based on falsity.** An application to have her fired for rebellion against
20 United States laws as well as subverting the constitution per section 3 of
21 amendment XIV is pending in the ninth circuit.

22 Interestingly, twitter(now X)-hired terrorists (self-proclaimed lawyers but
23 lying and vexatious arguments are not lawyers' statutory allowances)
24 NEVER responded to the assertion that their version of c1 is against the
25 14th amendment and the 5th amendment. Well, they couldn't. They
26 wouldn't even mention it is how obvious things are.

27 JSC and X's lack of response shows they've no valid grounds to
28 refute (failure to deny and adverse inference, see FRCP Rule 8 (d)).



12. Even if, subjunctively, arguendo, the terrorists' obviously unconstitutional and anti-grammar reading of the clause were correct, it still would NOT support "civil immunity" as they stated. The short title, which has no legal effect, but nonetheless a product of Congress, states explicitly that only (c) (2) relates to Civil liability. Subsection (c) (1)'s short title is "Treatment of publisher or speaker" and states "No provider or user of an interactive computer service shall be treated as the publisher or speaker of any information provided by another information content provider." (c) (2)'s short title is "Civil liability", and immunes good faith removals or restriction of access.

13. It follows, that if "No provider or user of an interactive computer service shall be treated as the publisher or speaker of any information provided by another information content provider" means what they state, at best, it supports restituting their entire business. Again, I am the intended beneficiary of all their advertisement contracts, and I have the right as third party to ask for restitution of such clearly illegal contract. If their argument stands, any act of removal or editing or abridgment which is still editing and changing meaning IS republishing IS the treatment of them "as the publisher or speaker of any information provided by another information content provider." So they argue their contract is illegal in law, VOID that is, as much of their contract promises to edit or remove content. In that case, it should be fully restituted. Nothing AT ALL in CDA 230 says c1 is about immunity; it follows any violation of c1 should be treated seriously by the Court. To put it in better wording, c1 only says what it says, and does not say anything about removing liability.

14. The above is exactly why lying lawyers are terrorists. EVEN if their argument on c1 stands, it still does not bare relevance



1 to immunity or Court ignoring what happened. Instead,
 2 it obliges court to retribute their *entire* business.

3 But these terrorists FRAUDULENTLY conceal what
 4 their argument actually suggests, and defraud their own
 5 clients INTO BANKRUPTCY, without any revealing.

6 **Terrorists deserve at least ONE THING:**
 7 **maximum security prison**
 8 **AS WELL AS**
 9 **solitary confinement.**

10 A contract illegal in law is a contract prohibited by law. It has many
 11 names. Void. Illegal. Prohibited by law. Contempt of the United States.
 12 Et cetera. Their argument is that the contract is prohibited by law. If it is
 13 so, retribute it already.

14 15. The subversion started with terrorists going in and pretending the law said
 15 something else. They came in and asserted that ICPs must be entirely
 16 different from ICSs, in a binary way, that you can only be either but not
 17 both. But I mean c1 literally says provider or user. Why ignore "user"? If
 18 the law is any confusing, it wouldn't say user, or "in good faith". The
 19 subversion by any judge of CDA 230 is clearly malignant. There is no
 20 ground, even without thinking, only with having read through CDA 230, to
 21 think that bad faith removals are allowed. The legislator's intent is so clear.
 22 The incitement was simple: they took out the word "another" or changed its
 23 meaning. BUT EVEN THEN, doesn't the natural meaning of "development
 24 of information in part" clearly include a feed and presentations and
 25 deletions: the information is literally EDITED? What you see, the



1 information, is different before and after the restriction of access
 2 or deletion, so how is that not development of information in part???

3 Their webpage literally LOOKS different after the editing or
 4 deleting or abridging. So how does the Court plan to continue on
 5 with this *BIG LIE* (a Nazi idea that extreme repetition of lies will
 6 make people believe it as true)? The information literally looks
 7 different after their editing. In fact it's even defamatory. The
 8 meaning even changes. So how does the Court plan to continue on
 9 with this *BIG LIE* (a Nazi idea that extreme repetition of lies will
 10 make people believe it as true)? The *big lie* by terrorists preying on
 11 everything the Constitution guarantees.

12 *"A big lie (German: große Lüge) is a gross distortion or misrepresentation of*
 13 *the truth primarily used as a political propaganda technique"* invented by
 14 the NAZI party. —source Wikipedia

15 16. The above clearly show the constitution, and the text of the law
 16 ignored by the ruling of the ninth circuit, and legislator's intent, all
 17 of which are necessary for the success of the claim 4:23-cv-05448.
 18 Without these arguments considered, the case is destined to fail.
 19 This is a COMPELLING reason for court to allow me to intervene, bigly.

20 17. Equally, without tackling the earlier subversive rulings by
 21 the same judge, their case is destined to fail per the ruling of
 22 4:22-MD-3047-YGR, and 4:21-CV-06561-YGR—two rulings by
 23 the same judge in this present case—Yvonne Gonzalez Rogers.
 24 This is especially because the state AGs did not really respond to the clearly
 25 false first amendment defenses by the terrorists in their opposition (doc 95).
 26 They did not go into how the first amendment does not bar any part of the
 27 claim, nor do they need to, but that is relied on by Meta. **HOWEVER, this**
 28 **is extremely dangerous as the presiding judge ruled falsely to**



1 protect similar crimes or illegalities with very clearly absurd
2 reasoning of the 1st amendment.

3 I do state that such ruling is a knowing and willful wrong and is malevolent.

4 18. In the JSC case, first amendment was used by Twitter as a
5 defense, but I called it absurd and abusive and a vexatious
6 argument. I did not go into it, feeling similar to state AGs in this
7 case on how absurd it is. HOWEVER, after reading 4:22-MD-3047-
8 YGR, and 4:21-CV-06561-YGR, I find this case WILL fail in her
9 hands if I don't go into it (if my arguments aren't considered).
10 Going into it will clear the path for my suit as well.

11 19. In the 2022 case, YGR ruled "timing and clustering of
12 notifications of defendants' content to increase addictive use
13 is entitled to First Amendment protection". She subsequently said
14 "The Court conceives of no way to interpret plaintiffs' claim with respect to
15 the frequency of the notifications that would not require defendants to
16 change when and how much they publish speech. This is barred by the First
17 Amendment." and "Accordingly, the Court finds that the First Amendment
18 protects defendants for the timing and clustering of notifications they
19 publish to users regarding content created by defendants themselves. These
20 are fundamentally choices about when and to whom to publish content
21 notifications. The motion to dismiss the product defect claims as to this
22 defect is GRANTED." In the Netflix case (4:21-CV-06561-YGR *The Estate*
23 *of B.H. et al v. Netflix, Inc.*), she granted defendant Netflix's motion to
24 dismiss because plaintiffs "premised" the operative complaint on Netflix
25 intentionally abetting suicide (targeted advertisement at those at risk) "on
26 the content and dissemination of the show." She found the plaintiffs'
27 injuries were inseparable from a specific show. She proclaims she was



1 therefore left with no option but to conclude that, "[w]ithout the content,"
 2 meaning the show in question, "there would be no claim."

3 This analysis is disgusting to say the least. FOLLOWING this
 4 analysis, she annuls all of harassment, intrusion of privacy,
 5 stalking, defamation, abetting suicide (including specifically
 6 suicide pacts) which is murder, perjury and other offenses on lies,
 7 fraud or breach of contract, importation with false statements
 8 (18 U.S. Code § 542), AND EVEN hitman contracts
 9 (solicitation to or abetting murder), et cetera. The length she
 10 will go to protect malicious syndicates is appalling. In all of
 11 those occasions, "[w]ithout the content," meaning the
 12 speech in question, "there would be no claim" or case. In
 13 all of these occasions, including harassment and fraud, it
 14 must be that "The Court conceives of no way to interpret
 15 plaintiffs' claim with respect to the frequency of the
 16 notifications that would not require defendants to
 17 change when and how much they publish speech".

18 Long story short, YGR truly will go to
 19 any length to protect the illegal and in
 20 many occasions criminal conduct by ICPs.

21 IN SHORT, YGR repeatedly held, in conspiracy or collusion or aid of
 22 ICPs' illegalities incl. negligence and even intentional conduct, AND ONLY
 23 IN SUCH CONTEXTS, that their speech is protected simply because
 24 it is speech. This is pure and simple subversion of the Constitution.
 25 As well, this is absurdity on a creating-a-new-world level. In those
 26 particular cases, she held respectively that harassment (the timing



1 and clustering of notifications, when and to whom to publish) and
 2 abetting suicide which is the crime of MURDER are protected by
 3 the first amendment, as they are conduct by way of speech.

4 YGR, as an article III judge, is also a judge in criminal proceedings. But she
 5 never AT ALL held that any of the above mentioned offenses are "barred by
 6 the first amendment". This shows beyond any doubt that she understands
 7 perfectly how the first amendment works, but lies about it to protect a
 8 particular group of people, social media companies that is. And most
 9 prominently, her ruling clearly violates the fourteenth amendment. IF
 10 speech cannot be barred, regardless of its nature or purpose, or meaning or
 11 content, or mode or frequency and way of impartation or communication,
 12 simply because it is speech, then harassment and hiring hitmen are
 13 allowed by the first amendment. BUT she does not hold 18 U.S.
 14 Code § 2261A as unconstitutional, or cast any doubts on the crime
 15 of murder or the criminality of abetting (18 U.S. Code § 2), but Netflix
 16 and by a long shot social media companies in general (other ICPs) deserve
 17 to have their conduct "immune" simply because the conduct is speech,
 18 this kind of ruling violates the fourteen amendment badly, as she's using
 19 lies or half-truths which are lies to create a privileged class & deny equal
 20 protection. AGAIN, her absurdity is paramount and it's fully
 21 intentional. She really has no limits on going in to aid and abet
 22 whatever illegalities illegal syndicates have done.

23 20. Since the enactment of the amendments, speech integral to illegal conduct
 24 or rather violation of others' rights has never been protected by the first
 25 amendment. In fact, YGR is so clearly aware of this that she quotes the
 26 exceptions to protecting speech integral to illegal conduct in the Netflix case.

27 In the Netflix case, she quotes case law that states it's only per the public
 28 interest that certain speech discussing the ills of society is protected,



1 although it may be integral to illegal conduct or violation of others' rights.
 2 However, they did sue for Netflix's targeted advertising and failure to warn,
 3 neither of which is discussing the ills of society or making a TV show. Those
 4 are targeted advertising and failing duty of care (to warn), and they clearly
 5 are not the making and showing of the TV show itself. The complaint even
 6 specifically said they were not suing for the TV show itself.

7 Basically, it is only in exceptional cases speech integral to illegal conduct
 8 may be protected. Those relate to public discussion or public interest.

9 There is no ground to hold illegal conduct is allowed by the first because it's
 10 by way of speech. This is a basic building block of United States laws.
 11 Nothing in Meta's conduct relates to THEM expressing public discussion or
 12 political opinion, and thus such things as a public interest test is irrelevant.

13 21. IN FACT, sending obscene or otherwise illegal content in notifications, or
 14 sending them at certain times of the day, is a clear case of harassment and
 15 intrusion of privacy. But YGR says this must be protected simply because
 16 it is speech. SHE rules to abolish tort laws at large to protect
 17 INTENTIONAL conduct by ICPs.

18 22. IF YGR's rulings of unlimited free speech or free speech as the only thing
 19 in the Constitution (speech is protected simply because it is speech) stand,
 20 it is a must that all law enforcement and the courts are abolished. Namely,
 21 civil courts deal with violation of rights by means of speech every day, be it
 22 breach, fraud, IIED, or defamation, or harassment or intrusion of privacy.
 23 Even negligent cases involving lack of warning is a matter of failure to
 24 speak or express: forcing someone to speak also "violates" free speech, as it
 25 includes whether to speak, not just what to and when to speak. And yet she
 26 used this absurd rulings to willingly and flagrantly protect intentional torts
 27 TWICE, and she probably will do it again in this case without my
 28 intervention.



1 AND AGAIN, she does it knowingly and willingly and with malice
 2 as she deals with speech violations including criminal violations as
 3 a criminal and civil judge all the time.

4 LONG STORY SHORT, there is no ground to hold that a violation
 5 of rights should be allowed because it is by method of speech.

6 The first amendment is not the only clause in the constitution. The fifth
 7 amendment protects right to life, health, property, and liberties. The fifth and
 8 fourteenth amendment protects the right to privacy or Personal Autonomy. In
 9 fact, free consciousness is the preexisting condition to free speech, so the right
 10 to privacy is even protected by the first. It is important that the first and fifth
 11 amendment have the same weight as enactments. And to evaluate the
 12 legislator's purpose, those need to be read together.

13 Like all rights, when reasonably necessary, it is not required to amend the
 14 Constitution to limit them. It's only a matter of balancing rights to free speech
 15 and other rights. This is called *proportionality* in the British realm.

16 *"Categories of speech that are given lesser or no protection by the First*
 17 *Amendment include obscenity (as determined by the Miller test), fraud, child*
 18 *pornography, speech integral to illegal conduct, speech that incites imminent*
 19 *lawless action, and regulation of commercial speech such as advertising. Within*
 20 *these limited areas, other limitations on free speech balance rights to free speech*
 21 *and other rights, such as rights for authors over their works (copyright),*
 22 *protection from imminent or potential violence against particular persons,*
 23 *restrictions on the use of untruths to harm others (slander and libel), and*
 24 *communications while a person is in prison."*—Wikipedia

25 There is generally no freedom of speech when such speech is used to achieve
 26 harm of others' rights, including right to privacy (such as by harassment). That
 27 is the law. With this said, when speech is used for discussion or political
 28 opinion, it has stronger protection.



1 This has to do with two things: a) the right to speak is obviously subordinate
 2 to (actual) national security, right to life, health, property, privacy, and other
 3 constitutional rights or otherwise rights. b) the legislator's purpose or intent.

4 In *New York Times Co. v. Sullivan*, 376 U.S. 254 (1964), Justice William J.
 5 Brennan Jr. authored the Court's opinion, and five other justices joined it. The
 6 Court began by explaining that criticizing government and public officials was
 7 at the core of the American constitutional rights to freedom of speech and
 8 freedom of the press.

9 *"The general proposition that freedom of expression upon public questions is*
 10 *secured by the First Amendment has long been settled by our decisions. The*
 11 *constitutional safeguard, we have said, "was fashioned to assure unfettered*
 12 *interchange of ideas for the bringing about of political and social changes*
 13 *desired by the people." ... "[I]t is a prized American privilege to speak one's mind,*
 14 *although not always with perfect taste, on all public institutions."* ... *The First*
 15 *Amendment, said Judge Learned Hand, "presupposes that right conclusions are*
 16 *more likely to be gathered out of a multitude of tongues, than through any kind*
 17 *of authoritative selection. To many, this is, and always will be, folly; but we*
 18 *have staked upon it our all."*

19 Of course, the legislator's purpose does not trump the natural grammar of the
 20 actual law. As the CA said in the pentagon papers case, "heavy presumption
 21 against its constitutional validity" is how any speech injunction must survive.
 22 **But they never said the Constitution protects any speech, WHICH IS**
 23 **Meta's argument.** The legislator's purpose was clear in securing debates and
 24 criticism. When speech is relevant to this purpose, it is protected more as
 25 precedents held. Specifically, the legislator's purpose was "to assure unfettered
 26 interchange of ideas for the bringing about of political and social changes
 27 desired by the people". It has nothing at all to do with ruining life or fraud or
 28 transgression of personal autonomy or harming health.

29 I should remind y'all, free speech includes access to information. Free
 30 consciousness is the preexisting condition or prelude to free speech.



1 I stated that the 5th supports the legislator's intent as it has the same
2 weight and was enacted together with the 1st. It was specific even in
3 the ten original amendments that free speech is not intended to be
4 unlimited and certainly is not to be used to harm other rights.

5 All court rulings, specifically Supreme Court rulings, follow the legislator's
6 intent of protecting public debate. In *Snyder v. Phelps*, 562 U.S. 443
7 (2011), the SC held Speech on a matter of public concern, in a public place,
8 cannot be the basis of liability for a tort of emotional distress, even if the speech
9 is viewed as offensive or outrageous. And yet, the terrorists hired by social
10 media companies, who seem capable of nothing other than lying ON COURT
11 RECORD, say that because their company's intentional torts were done in the
12 manner or means of speech, they are protected by the first amendment. BY
13 THEIR and YGR's logic, I'd have the right per the first amendment to hire
14 a hitman to murder them, as that OBVIOUSLY is EQUALLY limited to being
15 in the manner or means of speech. I call them terrorists for a REASON.

16 I mention *Snyder v. Phelps*, 562 U.S. 443 (2011) and the rule on actual malice
17 specifically to point out that there is VERY few limitations on tort law by the
18 1st. And to strike a case of negligence or even intentional tort due to free speech
19 is nothing but a challenge to the existence of the country. It follows, if speech
20 cannot be used to abet suicide, or defraud, or obstruct justice or legislation or
21 gov't function, or harass, of course the decisions by YGR (respectively on
22 harassment or intrusion of privacy and intentionally abetting suicide by
23 TARGETED ADVERTISEMENT) to dismiss per the 1st, which is clearly
24 irrelevant, are wrong and subversive.

25 Of course, the first amendment is not limited to speech. It's freedom of speech,
26 press, religion, and assembly.

27 As a general and fast rule, if the conduct in question is not for the purpose of
28 expressing a political opinion or art, it likely has no relevance to the 1st. The



1 protection of the first is *more purpose oriented*, than means oriented, different
2 from other rights. Even the actual malice ruling on defamation was tied to
3 criticizing the gov't. "The constitutional guarantees require, we think, a federal
4 rule that prohibits a public official from recovering damages for a defamatory
5 falsehood relating to his official conduct unless he proves that the statement
6 was made with "actual malice" *New York Times Co. v. Sullivan*, 376 U.S.
7 254 (1964). All rulings protecting speech by the SC relates to that purpose, or
8 at least when the purpose is met, the protection is stronger and stricter.
9 Whereas when the speech is not mainly for such purposes, the "presumption
10 against its constitutional validity" is much weaker, and in many cases not
11 there, as other rights are violated by means of speech. The test is balance of
12 rights. Free speech is an important and constitutional right.

13 For the most extreme examples, lying to Congress or Court (contempt of
14 Congress or Court) or not showing up against a summons (order by Congress
15 or Court) to testify (with perjury to frame someone or false accusations
16 included) does not directly harm others' right to life, property, liberties, but
17 since they harm the state's operation (obstruct legislation or justice) and
18 vicariously social welfare, they are held as necessary limitation of
19 rights, including the right to liberties as it is imprisonment. Similarly,
20 copyright and patent laws exist. So this lowest standard or extreme example
21 show how much a test of constitutional validity requires determining whether
22 or not something is a necessary and proper limitation to Constitutional rights,
23 especially free speech, which is more tested on this scale, as it was never even
24 intended to be an absolute unlimited right. The weight of the presumption in
25 testing is very different if the purpose is nonexistent in the conduct concerned.

26 Although social media companies' algorithms and otherwise manipulations do
27 bring about political and social changes, it is achieved by fraud, manipulation
28 (not unfettered interchange of ideas) and pretending to be objective and



1 fraudulently pretending to host opinions of all sides, it is thus not protected by
 2 the 1st. Limiting manipulations such as defamation and brainwashing
 3 (misinforming) is not against the first. What they are committing, by and large,
 4 is brainwashing by repeating what they in many occasions know to be
 5 misinformation to achieve brainwashing. Deleting Harvard-graduated doctors'
 6 opinions not mirroring Anthony Fauci's on SARS Junior is a classic example.
 7 Like I said, sure, what these abusive ICPs are doing is speaking their minds,
 8 but their minds is committing the crime of torture (18 U.S. Code § 2340A)
 9 against the people with brainwashing, fraud, harassment, et cetera. Note that
 10 torture is a crime that requires "whoever outside the United States commits".
 11 Social media companies' speech policing and other conduct including
 12 brainwashing has nothing to do with expressing a political opinion, but has to
 13 do with fraud and defamation and other torts. Neither does their feed or
 14 algorithm have to do with that. It's simple fraud and defamation and other
 15 illegalities. They do speak to the public both expressly and implicitly that they
 16 are neutral, that anyone can register, that they have rules and won't disappear
 17 random opinions in compliance with those rules, that they host opinions on
 18 both sides. None of these representations is true.
 19 MOST IMPORTANTLY, manipulating public opinion pretending to be doing
 20 something else is "unfettered interchange of ideas for the bringing about of
 21 political and social changes desired by the people". In fact it is per se fettering
 22 the interchange of ideas, so it definitely is not protected by the 1st.
 23 In any case, as well stated, they are not protected to use speech to
 24 violate others' other rights incl. constitutional rights.
 25 AGAIN, YGR's conduct in those cases, saying simply because the defendant
 26 used speech as a means to achieve human rights violations, when the case was
 27 intentional tort (harassment and abetting suicide), they are protected by the
 28 first, is nothing but intentional destruction of the United States of America (its



constitution). It's a **heinous and flagrant** lie. What's appalling is that she didn't even take money from the allegedly criminal syndicates. In other words, she was doing it out of pure and simple sadism. Antisocial personality disorder. **I vigorously ask the 42 state AGs to try and** a) send YGR to jail for rebellion against the lawful authority of the United States or the laws thereof WITH direct intention (18 U.S. Code § 2383), and fraud of course, do quote the EPC, b) get her fired per section 3 of the 14th amendment, note that that section specifically refers to "judicial officers", c) investigate whether she acts out sadism elsewhere such as namely child abuse or domestic violence, d) severely censure her, e) file for injunctions to have her recuse, remember nemo iudex in parte sua, she has no jurisdiction on that (invoked by the United States Supreme Court in various cases, such as the 1798 case *Calder v. Bull* ("a law that makes a man a Judge in his own cause [...] is against all reason and justice") and the 1974 case *Arnett v. Kennedy* ("we might start with a first principle: '[N]o man shall be a judge in his own cause.' *Bonham's Case*, 8 Co. 114a, 118a, 77 Eng. Rep. 646, 652 (1610)")), f) maybe write a public statement or have a press conference, you have the freedom to literally cry about the abuses you suffer from her and Meta's lawyers. Drama has ALWAYS been underestimated in this country. g) call Merrick Garland and homeland security and the military (the military has a blanket auth. to deal with insurrection per Art I sec. 8 of the Constitution) and see what they say.

23. Nothing raised in the complaint of this case could possibly be seen as protected by the first, as they do not relate to the purpose (discussion and criticism), and are straightforward violations of rights for the sake of illegal profits. Lying to Congress then could not possibly be protected by the first. Those assertions by Meta's counsel are quite appalling.

24. IN SUMMARY, the above clearly shows that if my arguments (on CDA 230 c1 more specifically as the AGs failed to find fault with the ninth circuit's



1 ruling, but the 1st as well, cuz they didn't pertinently respond to previous
2 clearly subversive and malevolent rulings by the same judge) are not
3 considered, the plaintiffs' case is destined to fail entirely per the
4 current falsity by the ninth circuit that is against both the constitu. and the
5 text of c1 itself, and against legislator's intent, and per YGR's previous
6 subversions protecting ICPs stating they have absolute free speech and that
7 the 1st amendment protects all and any speech regardless of its content or
8 purpose or way of impartation (such as by intrusion of privacy).

9 It comes back to simple points: the question the court has to answer is
10 whether or not republishing or "changes to the content posted by the
11 website's users" is immune, and the validity incl. constitutional validity of
12 such immunity, and CRUCIALLY what ICP conduct is. Then, to apply the
13 law, the court has to answer whether they're being treated as another ICP
14 or the ICP; as for free speech, the question is even simpler, do ICPs have
15 special privileges to murder, or not? Cuz if such is true, in fact twitter would
16 be a great platform to hire a hitman. After all, hiring is only by speech, so
17 is encouragement for others to join ISIS or Al-Qaeda only by
18 speech. Brand NEW FREEDOM given by the rulings of YGR,
19 how interesting. YES YGR does threaten the national security of the
20 United States of America. Don't forget, the cases she ruled against,
21 "protected by 1st", was harassment, and abetting suicide
22 which is murder. These are WELL-established WELL-settled law
23 that they are things you can't do, by whatever means, including specifically,
24 by means of speech. That's what she ruled on. IT IS COMPLETELY
25 INEXCUSABLE, her transgression of the national security of the United
26 States of America.

27 **COMPLETELY INEXCUSABLE**

1 Of course the EPC also applies on free speech issues. If others' free speech
 2 to murder or harass is nonexistent, there's no reason ICPs are above the
 3 law or have that special privilege.

4 Although the above also clearly show the corruptions and insurrections by
 5 JSC and YGR, they are not the subject of the motion.

6 Further, the above also show the 42 state AGs do not adequately
 7 represent my interests, as they had failed to refute the lies by the
 8 defense counsel. This makes it a matter of right to intervene.

9 25. Lastly, I should state, as I am situated in China (PRC), if there are to be
 10 any hearings, I will have to attend remotely. I'm not obliged to attend
 11 hearings though as I am an intervener, not the plaintiff or defendant.
 12 The utter desperation and urgency is that the Court does not make a
 13 FURTHER unconstitutional and subversive (of 230 itself) ruling, in other
 14 words, having the court consider my arguments.

15 26. The 42 states' AGs are urged to fully read and comprehend this motion,
 16 AS QUICKLY AS POSSIBLE, and to file opinions on the issues raised,
 17 given their extreme importance. They'd lose the chance to file a recusal
 18 application if they don't act fast. They should especially take note of and
 19 tackle the track record of YGR, who ruled harassment, intrusion of
 20 privacy, murder by abetting suicide, and general violations of rights are
 21 protected by the first amendment, as banning them would change the
 22 content and mode of their speech, and ICP's "immune" for its own conduct.

23
 24 Declaration

25 I declare under penalty of perjury under the laws of the United States of America
 26 that the foregoing is true and correct.

27 (In accordance with 28 U.S. Code § 1746)



28
 29 Taiming Zhang, movant



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